

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875 HON. ROBERT B. KUGLER
THIS DOCUMENT RELATES TO ALL CASES	

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Dr. Ursina Teitelbaum, on March 10, 2022, at 9:00 a.m. Eastern time, and continuing until completion, at Honik LLC, 1515 Market Street, Suite 1100, Philadelphia, PA 19102. The witness shall produce the documents requested at Exhibit A, attached hereto, at least two days in advance of the deposition, to the extent not already served upon Plaintiffs.

TAKING ATTORNEY FOR PLAINTIFFS:

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The videotaped deposition will be taken via Zoom before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

February 23, 2022

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/ Rachel Geman
Rachel Geman
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EXHIBIT A

DOCUMENT REQUESTS

1. Copies of all invoices for work performed in connection with any consultation or expert work performed for or on behalf of any defendant or their counsel with regard to any issues in this MDL, including but not limited to for the review of documents, review and consultation with regard to plaintiff experts, preparation of Dr. Teitelbaum's report, and preparation for deposition or trial.
2. Any notes, i.e. written or electronic, reflecting consulting or litigation work that has not been documented in invoices.
3. All documents relating to any remuneration you have received from any manufacturer, distributor, or retailer of pharmaceutical drugs.
4. Any articles, presentations, seminars, classes, or other similar documents (including PowerPoint-type slides) authored or used by Dr. Teitelbaum with regard to hypertension, treatments for hypertension, ARBs, or medical monitoring plans.
5. Any articles, presentations, seminars, classes, or other similar documents (including PowerPoint-type slides) authored or used by Dr. Teitelbaum with regard to cancer screening protocols devised by the United States Preventive Services Taskforce, American Cancer Society, American Society of Clinical Oncology, National Comprehensive Cancer Network, or other similar cancer screening protocols.
6. Any articles, presentations, seminars, classes, or other similar documents (including PowerPoint-type slides) authored or used by Dr. Teitelbaum with regard to the potential risks of cancer screening (e.g., patient anxiety, false positive results, overdiagnosis, overtreatment, procedure risk, etc.).
7. Copies of any documents or articles relied upon for the opinions set forth in the report served, if not listed in the report.
8. Copies of any documents or articles reviewed in connection with the report served, whether or not listed in the report or attachments thereto.
9. All documents reflecting any communications with patients concerning contaminated or recalled valsartan (you may redact patient identifiers and unrelated HIPAA-protected information).

10. All documents reflecting any communications with patients concerning recommendations – or lack thereof – for cancer screening following exposure to a known or probable carcinogen, including but not limited to asbestos, radiation, and NDMA/NDEA (you may redact patient identifiers and unrelated HIPAA-protected information).
11. Copies of all Publications and Presentations listed in Dr. Teitelbaum's CV, which is Appendix A to her Expert Report, and any updated CV or testimony list.
12. Any illustrations, PowerPoints, images, charts, tables or demonstrative exhibits that may be used by or with Dr. Teitelbaum in connection with a Daubert hearing or trial testimony in this litigation.
13. Documentation of any prior work Dr. Teitelbaum has done as a consultant for any of the Defendants in this action.
14. All documents reflecting valsartan or any other drug recalls relating to nitrosamines that you received, reviewed, or sent.
15. Any documents or other communications the witness has received from any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of information provided by counsel who retained the witness.
16. Any communications from the witness to any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of communications to counsel who retained the witness.
17. Any textbook referenced by the witness in forming her opinions.
18. All documents relating to any pharmacy benefit on which you consulted, including identity of entities and persons with whom you consulted.
19. Copies of all transcripts of testimony under oath given by Dr. Teitelbaum in the last 10 years.

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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2022, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' COUNSEL

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